

REMARKS/ARGUMENTS

Upon entry of the above amendment, claims 12-18 will have been amended.

In view of the above, Applicants respectfully request reconsideration of the outstanding rejections of all the claims pending in the present application. Such action is respectfully requested and is now believed to be appropriate and proper.

Initially, Applicants would like to express their appreciation to the Examiner for the detailed Official Action provided.

Turning to the merits of the action, the Examiner has rejected claim 17 under 35 U.S.C. § 112, second paragraph, as failing to comply with the written description requirement. By the present amendment, Applicants have amended claim 17 to clarify the scope of the invention. Thus, Applicants respectfully request that The Examiner withdraw the rejection.

The Examiner has rejected claims 12 and 15-17 under 35 U.S.C. § 102(e) as being anticipated by HUNA (U.S. Patent No. 6,944,273). The Examiner has also rejected claims 13 and 18 under 35 U.S.C. § 103(a) as being unpatentable over HUNA in view of RANALLI et al. (U.S. Patent No. 6,748,057). The Examiner has also rejected claim 14 under 35 U.S.C. § 103(a) as being unpatentable over HUNA in view of GOODMAN (U.S. Patent No. 6,735,617).

However, Applicants respectfully traverse the above rejections.

As noted above, Applicants have amended claims 12-18 and submit the same for reconsideration by the Examiner. Applicants respectfully traverse the above rejections based on amended claims 12-18 and will discuss the rejections with respect to the pending claims in the present application as will be set forth herein below. The

amendments to the claims merely clarify the subject matter recited in the rejected claims, but do not narrow the scope of the claims.

Applicants' claims 12-15 and 18 generally relate to a server apparatus connected to a transmitting IP apparatus. The transmitting IP apparatus transmits an e-mail to a receiving IP apparatus via the server apparatus. The server apparatus comprises a memory which stores an IP address related to the receiving IP apparatus associated with a telephone number related to the receiving IP apparatus. The IP address related to the receiving IP apparatus is distinct from an e-mail address. The server apparatus comprises a receiver which receives the e-mail from the transmitting IP apparatus. The e-mail includes the telephone number related to the receiving IP apparatus. The server apparatus further comprises an analyzer which obtains, from the received e-mail, the telephone number related to the receiving IP apparatus, and obtains, from the memory, the IP address related to the receiving IP apparatus associated with the telephone number related to the receiving IP apparatus. The receiving IP apparatus to which the IP address is related, is the same as the receiving IP apparatus to which the telephone number is related. The server apparatus further includes a transmitter that transmits the received e-mail to the receiving IP apparatus, based on the IP address related to the receiving IP apparatus. Claim 16 recites a related system. Claim 17 recites a related method.

Regarding the rejection of claims 12 and 15-17 under 35 U.S.C. § 102(e), HUNA relates to an apparatus and method for entering and transmitting a message at a future delivery time to a receiving device that is coupled either to a telephony-centric network or to a data-centric network. In HUNA, the message server 402 (514) translates the

message into a format compatible with the receiving device (520, 524, 528 and 532) and initiates delivery of the message at the future delivery time. For recipients having receiving devices connected to the telephony-centric network, the message server 402 (514) 1) embeds a telephone number of the receiving device (520, 524, 528 and 532) into the message and 2) routes the messages to an IP address of the local POP 408 (516) corresponding to the embedded telephone number (col.15, lines 52-60 and col.16, lines 53-58).

However, HUNA does not disclose at least a server apparatus that obtains, from the received e-mail, the telephone number related to the receiving IP apparatus, and obtains, from the memory, the IP address related to the receiving IP apparatus associated with the telephone number related to the receiving IP apparatus, the receiving IP apparatus to which the IP address is related being the same as the receiving IP apparatus to which the telephone number is related. Rather, HUNA obtains an IP address of the local POP 408 (516) corresponding to the embedded telephone number of the receiving device (520, 524, 528 and 532) (col.15, lines 52-60 and col.16, lines 53-58). As shown in Figs. 4 and 5, in HUNE, the local POP 408 (516) to which the IP address is related clearly distinct from the receiving device (520, 524, 528 and 532) to which the telephone number is related.

In direct contrast, the present invention recites an analyzer that obtains, from the received e-mail, the telephone number related to the receiving IP apparatus, and obtains, from the memory, the IP address related to the receiving IP apparatus associated with the telephone number related to the receiving IP apparatus, the

receiving IP apparatus to which the IP address is related being the same as the receiving IP apparatus to which the telephone number is related.

Further, HUNA does not disclose at least a server apparatus that includes a transmitter configured to transmit the received e-mail to the receiving IP apparatus, based on the IP address related to the receiving IP apparatus. Rather, in HUNA, the message server 402 (514) routes the message to the IP address of the local POP 408 (516) corresponding to the embedded telephone number of the receiving device (520, 524, 528 or 532) (col.15, lines 52-60 and col.16, lines 53-58). The local POP 408 (516) directs the local switch 454 (516) to call the receiving device over the telephony-centric network (col.15, lines 60-65) using the embedded telephone number of the receiving device (col.17, lines 43-63).

On the other hand, the present invention recites a server apparatus that transmits the received e-mail to the receiving IP apparatus, based on the IP address related to the receiving IP apparatus.

Thus, since HUNA does not comply with the recitation of the pending claims, the pending claims are clearly distinguished over HUNA.

Therefore, it is respectfully submitted that the combinations of features recited in Applicants' submitted claims 12 and 15-17 are not disclosed in HUNA cited by the Examiner, nor are they obvious thereover.

Regarding the rejection of claims 13 and 18 under U.S.C. § 103(a) as being unpatentable over HUNA in view of RANALLI et al, as discussed above, HUNA does not disclose at least a server apparatus that obtains, from the received e-mail, the telephone number related to the receiving IP apparatus, and obtains, from the memory,

the IP address related to the receiving IP apparatus associated with the telephone number related to the receiving IP apparatus, the receiving IP apparatus to which the IP address is related being the same as the receiving IP apparatus to which the telephone number is related and that transmits the received e-mail to the receiving IP apparatus, based on the IP address related to the receiving IP apparatus.

Thus, the pending claims are clearly distinguished over HUNA.

Therefore, it is respectfully submitted that the features recited in Applicants' submitted claims 13 and 18 are not disclosed in HUNA cited by the Examiner.

RANALLI et al. relates to an IP-PBX system that accepts a telephone number as a destination address, contacts a directory server, requests an IP address related to the telephone number and returns the IP address to the IP-PBX system (col.7, lines 51-67 and col.8, lines 1-18).

However, RANALLI et al. does not disclose at least an analyzer apparatus that obtains, from the received e-mail, the telephone number related to the receiving IP apparatus, and obtains, from the memory, the IP address related to the receiving IP apparatus associated with the telephone number related to the receiving IP apparatus, the receiving IP apparatus to which the IP address is related being the same as the receiving IP apparatus to which the telephone number is related. Rather, RANALLI et al. merely teaches that the IP-PBX system contacts the directory server to request the IP address related to the telephone number and returns the IP address to the IP-PBX system. Thus, RANALLI et al. does not contain any disclosures regarding an analyzer that obtains, from the received e-mail, the telephone number related to the receiving IP apparatus.

Further, RANALLI et al. does not disclose at least a transmitter that transmits the received e-mail to the receiving IP apparatus, based on the IP address related to the receiving IP apparatus. Rather, in RANALLI et al. the directory server merely returns the IP address to the IP-PBX system that has accessed the directory server. Thus, RANALLI et al. does not contain any disclosure regarding a transmitter that transmits the received e-mail to the receiving IP apparatus, based on the IP address related to the receiving IP apparatus.

On the other hand, the present invention recites an analyzer that obtains, from the received e-mail, the telephone number related to the receiving IP apparatus, and obtains, from the memory, the IP address related to the receiving IP apparatus associated with the telephone number related to the receiving IP apparatus, the receiving IP apparatus to which the IP address is related being the same as the receiving IP apparatus to which the telephone number is related and a transmitter that transmits the received e-mail to the receiving IP apparatus, based on the IP address related to the receiving IP apparatus.

Thus, the pending claims are clearly distinguished over RANALLI et al.

Therefore, it is respectfully submitted that the features recited in Applicants' submitted claims 13 and 18 are not disclosed in RANALLI et al. cited by the Examiner. Claims 13 and 18 are also submitted to be patentable over the Examiner's proposed combination, since neither of HUNA and RANALLI et al., nor any proper combination thereof, disclose the combination of features recited in Applicants' claims 13 and 18.

Regarding the rejection of claim 14 under U.S.C. § 103(a) as being unpatentable over HUNA in view of GOODMAN, as discussed above, HUNA does not disclose at

least a server apparatus that obtains, from the received e-mail, the telephone number related to the receiving IP apparatus, and obtains, from the memory, the IP address related to the receiving IP apparatus associated with the telephone number related to the receiving IP apparatus, the receiving IP apparatus to which the IP address is related being the same as the receiving IP apparatus to which the telephone number is related and that transmits the received e-mail to the receiving IP apparatus, based on the IP address related to the receiving IP apparatus.

Thus, the pending claim is clearly distinguished over HUNA.

Therefore, it is respectfully submitted that the features recited in Applicants' submitted claim 14 are not disclosed in HUNA cited by the Examiner.

GOODMAN relates to a system in which, when the sender's computer 920 sends a facsimile message to the recipient's facsimile machine 975, a facsimile message is sent from the sender's computer 920 to the sender's mail server 930. An address of the recipient's facsimile machine 975 includes a telephone number of the recipient's facsimile machine 975 and a domain name of the facsimile mail server 950. The sender's mail server 930 obtains an IP address of the facsimile mail server 950 from the DNS server 945, based on the domain name of the facsimile mail server 950. The sender's mail server 930 forwards the facsimile message to the facsimile mail server 950, based on the IP address of the facsimile mail server 950. The facsimile mail server 950 selects a gateway to which the facsimile message should be forwarded and forwards the facsimile message to the selected gateway. The gateway is selected, based on loads on different gateways at a time when the facsimile communication is forwarded. Ultimately, the facsimile message is delivered from the selected gateway to

the recipient's facsimile machine 975 over a "conventional telephone network" 970 (col. 6, lines 54-67 and col. 7, lines 1-33).

However, in GOODMAN, a telephone number "1112223333" is assigned to recipient's facsimile machine 975 (col.6, lines 63-67), but an IP address is not assigned to the recipient's facsimile machine 975. The telephone number "1112223333" assigned to the recipient's facsimile machine 975 is a conventional telephone number (col.6, lines 38-46). In other words, GOODMAN does not contain any disclosure regarding an IP address related to the recipient's facsimile machine 975. Thus, in GOODMAN, a facsimile message is forwarded from the VOIP Outbound Gateway 956 to the recipient's facsimile machine 975 over the conventional telephone network 970, using the telephone number "1112223333" of the recipient's facsimile machine 975.

Further, an address, for example, "1112223333@faxservername.xxx" is utilized for forwarding a facsimile message to the recipient's facsimile machine 975. The address consists of the conventional telephone number of the recipient's facsimile machine 975 and a name of the facsimile mail server 950 (col.6, lines 38-46 and col.7, line 15). In other words, the address does not include an address of the VOIP Outbound Gateway 956. Thus, GOODMAN does not contain any disclosure regarding a telephone number related to the VOIP Outbound Gateway 956.

Thus, GOODMAN does not disclose a H.323 gatekeeper which stores the IP address related to the receiving IP apparatus in association with the telephone number related to the receiving IP apparatus, since GOODMAN does not contain any disclosure regarding an IP address of the recipient's facsimile machine 975 or a telephone number of the VOIP Outbound Gateway 956. GOODMAN also does not disclose an analyzer

which determines whether the memory stores the IP address related to the receiving IP apparatus. Further, GOODMAN does not disclose a transmitter which accesses the H.323 gatekeeper to obtain the IP address related to the receiving IP apparatus when it is determined that the memory does not store the IP address related to the receiving IP apparatus.

Additionally, Fig. 13 of GOODMAN shows a gatekeeper lookup table which contains zones, gateway addresses, and gateway priority. However, none of these teach an IP address related to the receiving IP apparatus in association with the telephone number related to the receiving IP apparatus.

Thus, GOODMAN does not comply with the requirements, recited in claim 14, so this pending claim is clearly distinguished over GOODMAN.

Therefore, it is respectfully submitted that the features recited in Applicants' submitted claim 14 are not disclosed in GOODMAN cited by the Examiner. Claim 14 is also submitted to be patentable over the Examiner's proposed combination, since neither of HUNA and GOODMAN, nor any proper combination thereof, disclose the combination of features recited in Applicants' claim 14.

In addition, the Examiner has not set forth any proper motivation for the combination of the teachings of HUNA with the teachings of either of RANDALLI or GOODMAN. Merely because these documents deal with "analogous art" is an inadequate basis for the proposed combinations. Additionally, Applicants note that neither of the secondary references contain disclosure adequate or sufficient to overcome the above-noted significant and substantial deficiencies and shortcomings of HUNA.

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Accordingly, Applicants respectfully request reconsideration and withdrawal of the outstanding rejections, and an indication of the allowability of all the claims pending in the present application, in due course.

SUMMARY AND CONCLUSION

Applicants have made a sincere effort to place the present application in condition for allowance and believe that they have now done so. Applicants have amended the rejected claims for consideration by the Examiner.

With respect to the pending claims, Applicants have pointed out the features thereof and have contrasted the features of the rejected claims with the disclosure of the references. Accordingly, Applicants have provided a clear evidentiary basis supporting the patentability of all claims in the present application and respectfully request an indication of the allowability of all the claims pending in the present application in due course.

The amendments to the claims which have been made in this amendment, which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Should the Examiner have any questions or comments regarding this Response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,
S. WATANABE et al.



Bruce H. Bernstein
Reg. No. 29,027

William Pieprz
Reg. No. 33,630

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GREENBLUM & BERNSTEIN, P.L.C.
1950 Roland Clarke Place
Reston, VA 20191
(703) 716-1191